

US Dept of ST
CHICAGO/RI
Adoption Regulation Docket Rm

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10/18/03
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To Whom It may concern:

re: referencing docket number State/AR-01/96

Proposed regs will force all small and many medium-sized agencies to go out of business and favor large agencies due to financial requirements.

Many agencies use workers and adoption counselors without MSW's, who either have degrees in other disciplines or Bachelor's degrees and adoption experience. Many agencies find they do as good or better a job than MSW's.

Many executive directors of small agencies do not have MSW's and some who have been doing this work for years are non-degreed adoptive parents with years of experience.

Adoption agencies of any size are having difficulty obtaining errors and omissions insurance. Malpractice for a nurse is less than one hundred dollars a year. Quotes for small adoption agencies making under 25 or 30 placements a year range from \$9,000-\$50,000 if companies will insure them at all. This is for agencies that have never been sued. The hefty insurance requirements should be for large agencies or the Federal Government should arrange for or offer affordable coverage if it is going to be mandated.

Small agencies do not have financial reserves of \$40,000 to \$50,000. Many have executive directors who work for free or are grossly underpaid.

Private accrediting bodies charge outrageous fees to accredited agencies and charge for their travel and accommodations while doing the inspections. State agencies already perform this function, which is already time consuming and difficult for small agencies without much staff. The State agencies should be mandated to provide this service and should be allowed to charge a modest fee for accrediting international agencies. A few extra pages on their standards checklists can be added so that the inspections are uniform.

If small and mid-sized agencies are driven out of business there will be no freedom of choice for adoption consumers. That is a bad thing.

Many agencies pride themselves on their individualized training for adoptive parents. Mandated training will create cookie cutter services that will not benefit everybody and in some cases will be less effective than what is already provided.

Agencies cannot afford to add an additional 10 hours to their homestudy process without enormously increasing fees to clients.

Diana I. Jones All of the above requirements are so costly that they will immediately be passed on to the adoption
Lawrence T. Jones consumer, which is outrageous.
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Respectfully
Larry & Diana Jones